

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

The Roman Catholic Diocese of
Ogdensburg, New York,

Debtor.

)
)
) Case No. 23-60507 (PGR)

) Chapter 11
)
)

MOVING INSURERS' APPLICATION FOR ORDER SHORTENING TIME

Applicant, insurers identified in the signature block below (the "Moving Insurers"), requests that the time period for the Motion for the entry of an order: (i) authorizing the Moving Insurers to issue requests for production under Federal Rule of Bankruptcy Procedure 2004 and (ii) granting related relief (the "Motion") (Docket No. 138) as required by Northern District of New York Local Bankruptcy Rules 9013-1(e) and 9013-3 be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. The relief sought by the Moving Insurers is only effective if it is granted prior to the commencement of proposed mediation in the Debtor's *Motion for Entry of an Order Referring Certain Matters to Mediation* [Docket No. 44]. The Moving Insurers have requested documents from the Debtor in order to prepare for that mediation, as set forth in the Moving Insurers' Motion. These documents are yet to be produced despite weeks of effort by the Moving Insurers to request them and time is of the essence, particularly if the Debtor's proposed timeline for mediation, which would commence mediation in October, is approved without modification.

2. The Moving Insurers therefore ask to be heard on these issues on **October 3, 2023**.

The applicant requests entry of the proposed order shortening time.

Dated: September 26, 2023

Respectfully submitted,

By: /s/ Tancred Schiavoni

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